

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,	Adv. Pro. No. 08-01789 (SMB)
Plaintiff-Applicant,	SIPA LIQUIDATION
v.	(Substantively Consolidated)
BERNARD L. MADOFF INVESTMENT SECURITIES LLC,	
Defendant.	
In re:	
BERNARD L. MADOFF,	
Debtor.	

**DECLARATION OF JASON I. BLANCHARD IN SUPPORT OF THE TRUSTEE'S
REPLY TO THE PARTIAL OBJECTION OF FGLS EQUITY LLC TO THE TWENTY-
THIRD OMNIBUS MOTION TO OVERRULE OBJECTIONS OF CLAIMANTS
WHO INVESTED MORE THAN THEY WITHDREW**

I, Jason I. Blanchard, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am an associate with Baker & Hostetler LLP, counsel to Irving H. Picard, Esq., trustee ("Trustee") for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. § 78aaa et seq., and the chapter 7 estate of Bernard L. Madoff. I am a member of the Bar of this Court and in good standing.

2. As an attorney of record, I am fully familiar with the facts set forth herein and have personally reviewed the documents attached hereto.

3. FGLS Equity LLC ("FGLS") filed a customer claim with the Trustee on June 25, 2009 in the amount of \$12,245,897.63, which the Trustee designated as claim no. 011505 (the "Claim").

4. The Claim relates to the customer account held at BLMIS on FGLS's behalf, which BLMIS had assigned account number 1F0178 (the "Account").

5. Attached hereto as Exhibit 1 is a true and correct copy of the complaint the Trustee filed against FGLS on December 3, 2010, in the adversary proceeding styled, *Picard v. FGLS Equity LLC*, Adv. Pro No. 10-05191 (the "FGLS Action"), at ECF No. 1.

6. Attached hereto as Exhibit 2 is a true and correct copy of the answer and counterclaim FGLS filed on May 26, 2011, in the FGLS Action, at ECF No. 7.

7. Attached hereto as Exhibit 3 is a true and correct copy of the Claims Procedure Order,¹ entered on December 23, 2008, in the above captioned matter, at ECF No. 12.

8. Attached hereto as Exhibit 4 is Exhibit G to the Trustee's motion for entry of the Claims Procedure Order, which the Trustee filed on December 21, 2008, in the above captioned matter, at ECF No. 8.

9. Attached hereto as Exhibit 5 is a true and correct copy of the complaint the Trustee filed against C&P Associates, Ltd., Steven Mendelow, and others on November 23, 2010, in the adversary proceeding styled, *Picard v. Mendelow, et al.*, Adv. Pro No. 10-04283 (the "C&P Action"), at ECF No. 1.

10. Attached hereto as Exhibit 6 is a true and correct copy of the answer C&P filed on November 14, 2014, in the C&P Action, at ECF No. 65

¹ Capitalized terms used herein but not otherwise defined have the same meaning as ascribed to them in the Trustee's Reply to the Partial Objection of FGLS Equity LLC to the Twenty-Third Omnibus Motion to Overrule Objections of Claimants Who Invested More Than They Withdrew.

I certify under penalty of perjury that that the foregoing is true and correct to the best of my knowledge, information, and belief formed after reasonable inquiry.

Executed on November 20, 2018
New York, New York

/s/ Jason I. Blanchard
Jason I. Blanchard